

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**AMENDED JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to prosecute their actions against them.

Respectfully:

/s/ Barbara R. Binis
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Attorney for Plaintiffs on Exhibit A

Dated: August 31, 2015

EXHIBIT A – CLARK LOVE & HUTSON

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-cv-00872	Cathleen Ankenman, John Ankenmann v. Ethicon, Inc., American Medical Systems, Inc., Johnson & Johnson
2:12-cv-03813	Cindy Guerrero, Frank Guerrero, Jr. v. Ethicon, Inc., American Medical Systems, Inc., Johnson & Johnson
2:12-cv-05076	Juanita Himes, Norman Himes v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-cv-11546	D'aun Combest, Craig A. Combest v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-cv-32799	Patricia L. Ott, Patrick Ott v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-00299	Rebecca J. Long v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-00303	Susan H. Lovett v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation
2:14-cv-03986	Judith E. Stanley v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-06663	Rutha M. Griffin, Clarence Griffin, Jr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-08605	Catherine E. Yacko, Ronald R. Yacko v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation
2:14-cv-09253	Victoria A. Romero, Thomas R. Romero v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis